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**UNITED STATES DISTRICT COURT
 CENTRAL DISTRICT OF CALIFORNIA**

CHINA CENTRAL TELEVISION, a China
 company; CHINA INTERNATIONAL
 COMMUNICATIONS CO., LTD., a China
 company; TVB HOLDINGS (USA), INC., a
 California corporation; and DISH
 NETWORK L.L.C., a Colorado corporation,
 Plaintiffs,

vs.

CREATE NEW TECHNOLOGY (HK)
 LIMITED, a Hong Kong company; HUA
 YANG INTERNATIONAL TECHNOLOGY
 LIMITED, a Hong Kong company;
 SHENZHEN GREATVISION NETWORK
 TECHNOLOGY CO. LTD., a China
 company; CLUB TVPAD, INC., a California
 corporation; BENNETT WONG, an
 individual, ASHA MEDIA GROUP INC.
 d/b/a TVPAD.COM, a Florida corporation;
 AMIT BHALLA, an individual;
 NEWTPAD LTD. COMPANY d/b/a
 NEWTPAD.COM a/k/a TVPAD USA, a
 Texas corporation; LIANGZHONG ZHOU,
 an individual; HONGHUI CHEN d/b/a E-
 DIGITAL, an individual; JOHN DOE 1 d/b/a
 BETV; JOHN DOE 2 d/b/a YUE HAI; JOHN
 DOE 3 d/b/a 516; JOHN DOE 4 d/b/a HITV;
 JOHN DOE 5 d/b/a GANG YUE; JOHN
 DOE 6 d/b/a SPORT ONLINE; JOHN DOE 7
 d/b/a GANG TAI WU XIA; and JOHN DOES
 8-10,

Defendants.

Case No.
CV 15-1869 SVW (AJWx)
**PLAINTIFFS' NOTICE
 REGARDING
 MODIFICATIONS NECESSARY
 TO MAY 31, 2016 ORDER
 GRANTING PLAINTIFFS'
 MOTION FOR DEFAULT
 JUDGMENT AND
 PERMANENT INJUNCTION
 AGAINST DEFENDANTS
 CREATE NEW TECHNOLOGY
 (HK) LIMITED AND HUA
 YANG INTERNATIONAL
 TECHNOLOGY LTD. [DKT.
 NO. 192]**

Judge: Hon. Stephen V. Wilson

Complaint Filed: March 13, 2015

1 Plaintiffs China Central Television, China International Communications Co.,
 2 Ltd., TVB Holdings (USA), Inc., and DISH Network L.L.C. (collectively
 3 “Plaintiffs”) hereby submit this notice to advise the Court of certain requested
 4 modifications to the Court’s May 31, 2016 Order Granting Plaintiffs’ Motion for
 5 Default Judgment and Permanent Injunction Against Defendants Create New
 6 Technology (HK) Limited and Hua Yang International Technology Ltd. [Dkt. No.
 7 192] (hereafter the “May 31 Order”). The May 31 Order contains the incorrect
 8 amount of damages awarded to Plaintiffs and left blank the amount of the award of
 9 attorneys’ fees to Plaintiffs, as detailed below:

- 10 • **First**, in paragraph 7 on page 4 of the May 31 Order, the Court states
 11 that “Defendants are ordered to pay damages to Plaintiffs in the amount
 12 of **\$326,360,691.**” (Emphasis added). However, in Judge Morrow’s
 13 December 7, 2015 Amended Order granting Plaintiffs’ motion for
 14 default judgment against Defendants Create New Technology (HK)
 15 Limited (“CNT”) and Hua Yang International Technology Ltd.
 16 (“HYIT”) [Dkt. No. 158], the Court awarded Plaintiffs only **\$55,460,691**
 17 in copyright and trademark damages. Plaintiffs respectfully request that
 18 the amount of the damages awarded in paragraph 7 on page 4 of the
 19 May 31 Order be modified such that Defendants are ordered to pay
 20 damages to Plaintiffs in the amount of \$55,460,691, rather than
 21 \$326,360,691.
- 22 • **Second**, in paragraph 8 on page 4 of the May 31 Order, the Court left
 23 blank the amount of the attorneys’ fees awarded to Defendants.
 24 Plaintiffs have submitted all declarations and supporting evidence in
 25 support of Plaintiffs’ request for attorneys’ fees in the amount of
 26 **\$1,451,490** for the billed hours associated with CNY and HYIT’s
 27 liability. On April 4, 2016, the Court, in its Order granting Plaintiffs’
 28 request for a permanent injunction against CNT and HYIT, directed

1 Plaintiffs to file declarations in support of their request for attorneys'
 2 fees no later than April 15, 2016. Dkt. No. 185. Plaintiffs, on April 15,
 3 2016, filed two declarations of Carla McCauley, and exhibits thereto, in
 4 support of their request for attorneys' fees, in accordance with the
 5 Court's directive. Dkt. No. 187. These declarations and exhibits had
 6 been previously submitted under Docket Nos. 159 and 164. *See id.*
 7 Accordingly, the Court has before it all of Plaintiffs' support for the
 8 attorneys' fees it is requesting against CNT and HYIT and Plaintiffs
 9 respectfully request that the Court enter an award of attorneys' fees for
 10 Plaintiffs in the amount of \$1,451,490.

11 For these reasons, Plaintiffs respectfully request that the Court issue an
 12 Amended Order Granting Plaintiffs' Motion for Default Judgment and Permanent
 13 Injunction Against Defendants Create New Technology (HK) Limited and Hua Yang
 14 International Technology Ltd., correctly identifying the amount of damages awarded,
 15 and setting forth an amount of attorneys' fees awarded to Plaintiffs.

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 17 DATED: June 6, 2016

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21 By: /s/Sean M. Sullivan
 22 Sean M. Sullivan

23 Attorneys for Plaintiffs
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